

1 HEATHER FERBERT  
City Attorney  
2 MARK ANKCORN, SBN 166871  
Senior Chief Deputy City Attorney  
3 1200 Third Avenue, Suite 1100  
4 San Diego, California 92101-4100  
(619) 533-5800  
5 mankcorn@sandiego.gov

6 *Attorneys for Amicus Curiae*  
7 *City of San Diego*

8  
9  
10 UNITED STATES DISTRICT COURT  
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
12

13 NATIONAL TPS ALLIANCE, et al.

14 Plaintiffs,

15 v.

16 KRISTI NOEM, et al.,

17 Defendants.  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Case No. 25-cv-1766

**UNOPPOSED MOTION FOR LEAVE TO  
FILE *AMICI CURIAE* BRIEF IN  
SUPPORT OF PLAINTIFFS' MOTION  
TO POSTPONE EFFECTIVE DATE OF  
AGENCY ACTION**

The City and Local Government *amici curiae* (“Amici”) respectfully move for leave to file the attached proposed amicus brief in this matter. Counsel conferred with the parties, who advised that they do not oppose this motion. A full list of Amici are set forth in Appendix A hereto. In support of the motion, Amici state the following:

**1) Nature of movant’s interest**

Amici are eleven cities or counties, located in seven states across the country, that are collectively home to recipients of Temporary Protected Status (“TPS”) whose status is at risk as result of the actions by defendants Kristi Noem, the United States Department of Homeland Security, and the United States of America (collectively, “Defendants”). The revocation of TPS would negatively impact Amici, their communities, and their residents. TPS recipients contribute meaningfully to economic and cultural life: they work, pay taxes, raise children (some of whom are U.S. citizens), and participate actively in local communities. TPS protection also facilitates trust between immigrant communities and law enforcement. If TPS recipients are faced with the impossible choice of either going underground or returning to dangerous conditions in Venezuela, Amici will lose these invaluable community benefits. Accordingly, Amici have a strong interest in this matter.

**2) The parties supported by amici**

Amici request that the Court grant the plaintiffs’ motion to postpone the effective date of Defendants’ action.

**3) Why an amicus brief is desirable**

Amici possess unique insight into the impact of TPS on the communities where the Venezuelans who are recipients of TPS live and work. Amici lend a valuable perspective on the importance of TPS to communities across the United States.

**4) Why the movants’ position is not adequately represented by a party**

As local government entities, Amici’s perspective on the impact of TPS and its potential revocation is different from that of the plaintiffs. Amici are better positioned to speak to the impact of TPS revocation on, *inter alia*, local economies, tax revenues, public safety, and similar topics.

///

///

**5) Why the matters asserted are relevant to the disposition of the case**

Amici provide perspective and arguments regarding the impact of TPS and the devastating effects of TPS revocation that are highly relevant to the Court's decision regarding the plaintiffs' request for injunctive relief.

**6) The position of each party as to the filing of an amicus brief**

As noted, counsel for Amici have conferred with counsel for all parties, who advised that they have no objection to this motion.

\*\*\*\*\*

For these reasons, Amici respectfully request leave to file the attached amicus brief.

Respectfully submitted,

HEATHER FERBERT, City Attorney

Dated: March 18, 2025

/s/ Mark Ankcorn

Mark Ankcorn (SBN: 166871)  
Senior Chief Deputy City Attorney  
Office of the City Attorney  
1200 Third Avenue, Suite 1100  
San Diego, California 92101  
(619) 533-5800  
(619) 533-5856 fax

*Attorneys for Amicus Curiae  
City of San Diego*

**APPENDIX A**

**FULL LIST OF PROPOSED *AMICI CURIAE***

City of Denver

City and County of San Francisco

City of Hartford

City of Cambridge

City of San Diego

City of Chicago

City of Iowa City

City of Minneapolis

City of Saint Paul

City of Boston

County of Santa Clara